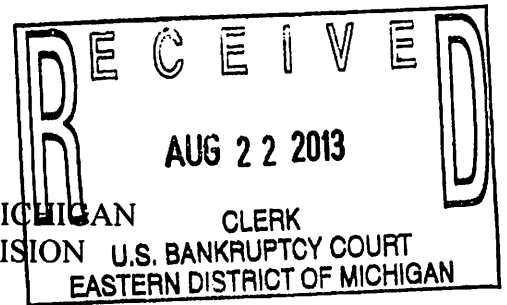


UNITED STATES DISTRICT COURT OF MICHIGAN  
EASTERN DISTRICT, SOUTHERN DIVISION



In Re CITY OF DETROIT, MICHIGAN

Bankr. E.D. MI  
Case No. 13-53846

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EX-PARTE MOTION FOR PERMISSION TO SUBMIT WRITTEN (PAPER)  
PETITION TO LIFT STAY

NOW COMES Ronald Cook, Plaintiff/Appellant in Michigan Court of Appeals cases COA 310509 and 308561, respecting which the City of Detroit has filed a Notice of Suggestion of Pendency of Bankruptcy Case and Application of the Automatic Stay, and respectfully requests the Court for permission to submit his petition to lift the stay in writing (paper), as opposed to e-filing. In support of his motion, Cook and his attorney state as follows:

1. Neither Cook nor his attorney has any experience in filing any pleading in a bankruptcy case.
2. Cook's attorney L. Rodger Webb has practiced since 1981 in the District of Columbia and Michigan and has never handled a bankruptcy case, and has no interest in handling or capability to handle a bankruptcy case. Webb is a union side labor lawyer who also handles auto accident and employment cases, including contract and statutory claims.
3. Webb has no need of, and will never use, the requisite training to e-file in Federal Court bankruptcy cases. The instant case is the only case, barring like

unforeseeable uniquely untoward events as have transpired with regard to these cases, in which he will ever appear in a bankruptcy case. Requiring Webb and/or his paralegal to attend a four hour class to learn how to e-file in Bankruptcy Court, apparently offered once a month, in these premises would exalt form over substance and result in unnecessary delay.

WHEREFORE, petitioner Cook respectfully requests the Court to grant his motion for permission to submit written documents to the Court, in the stead of e-filed documents.

Respectfully Submitted,

L. Rodger Webb, P.C.



By: L. Rodger Webb (P33356)  
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Dated: August 21, 2013

UNITED STATES DISTRICT COURT OF MICHIGAN  
EASTERN DISTRICT, SOUTHERN DIVISION

In Re CITY OF DETROIT, MICHIGAN

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BRIEF IN SUPPORT OF EX-PARTE MOTION FOR PERMISSION TO SUBMIT  
WRITTEN (PAPER) PETITION TO LIFT STAY

In support of his motion, Plaintiff Cook relies upon the Court's inherent authority to control its docket and the manifest interest of justice.

Respectfully Submitted,

L. Rodger Webb, P.C.



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Dated: August 21, 2013